

**THE ROSEN LAW FIRM, P.A.**

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[Proposed] Lead Counsel for Plaintiffs and Class

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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TONY KHOURY, Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

vs.

FXCM INC., DROR NIV, and ROBERT LANDE,

Defendants.

**CASE No.: 1:17-cv-00916-RA**

**NOTICE OF MOTION OF  
683 CAPITAL PARTNERS,  
LP AND SHIPCO  
TRANSPORT INC. TO: (1)  
CONSOLIDATE RELATED  
ACTIONS; (2) APPOINT CO-  
LEAD PLAINTIFFS; AND (3)  
APPROVE CO-LEAD  
PLAINTIFFS' SELECTION  
OF COUNSEL**

**CLASS ACTION**

-----X

-----X

YING ZHAO, Individually and on Behalf of All Others  
Similarly Situated,

Plaintiff,

vs.

FXCM INC., DROR NIV, and ROBERT N.  
LANDE,

Defendants.

**CASE No.: 1:17-cv-00955-UA**

**CLASS ACTION**

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DAVID BLINN, Individually and on Behalf of All Others  
Similarly Situated,

**CASE No.: 1:17-cv-01028-RA**

Plaintiff,

**CLASS ACTION**

vs.

FXCM INC, DROR NIV, and ROBERT N. LANDE,

Defendants.

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683 CAPITAL PARTNERS, LP, Individually and on Behalf  
of All Others Similarly Situated,

**CASE No.: 1:17-cv-02506-UA**

Plaintiff,

**CLASS ACTION**

vs.

GLOBAL BROKERAGE, INC. f/k/a FXCM INC., DROR  
NIV, and ROBERT LANDE,

Defendants.

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**PLEASE TAKE NOTICE** that pursuant to Section 21D of the Securities and Exchange Act of 1934, 15 U.S.C. § 78u-4(a)(3)(B), as amended by the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), Plaintiffs 683 Capital Partners, LP and Shipco Transport Inc. (collectively, “Movants”) hereby move this Court, the Honorable Ronnie Abrams, United States District Judge, for an order:

- (a) consolidating the above-captioned related actions;
- (b) appointing Movants to serve as Co-Lead Plaintiffs in this action; and

(c) approving Movants' selection of The Rosen Law Firm, P.A. as Lead Counsel for the litigation.

In support of this Motion, Movants submit: (1) Memorandum of Law dated April 10, 2017 (and exhibits); and (2) a [Proposed] Order granting Movants' Motion to Consolidate the Related Actions, to Appoint Co-Lead Plaintiffs, and to Approve Co-Lead Plaintiffs' Selection of Counsel.

Dated: April 10, 2017

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Phillip Kim

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[Proposed] Lead Counsel for Plaintiffs and Class

**CERTIFICATE OF SERVICE**

I hereby certify that on this 10<sup>th</sup> day of April 2017, a true and correct copy of the foregoing **NOTICE OF MOTION OF 683 CAPITAL PARTNERS, LP AND SHIPCO TRANSPORT INC. TO: (1) CONSOLIDATE RELATED ACTIONS; (2) APPOINT CO-LEAD PLAINTIFFS; AND (3) APPROVE CO-LEAD PLAINTIFFS' SELECTION OF COUNSEL** was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Phillip Kim